

EXHIBIT V

From: [David Simons](#)
To: [Stameshkin, Liz](#); [Lauter, Judd](#); [Dunning, Angela L.](#); [Kathleen Hartnett](#); [mlemley@lex-lumina.com](#); [Ghajar, Bobby A.](#); [Ghazarian, Colette A](#)
Cc: [Jesse Panuccio](#); [Poppell, Cole A](#); [Biksa, Liene](#); [Weinstein, Mark](#); [Alvarez, Jessica](#); [Holden Benon](#); [Christopher Young](#); [Aaron Cera](#); [Cadio Zirpoli](#); [Joe Saveri](#); [Margaux Poueymirou](#); [Ashleigh Jensen](#); [Rya Fishman](#); [Matthew Butterick](#); [Nada Djordjevic](#); [James Ulwick](#); [Bryan L. Clobes](#); [Mohammed Rathur](#); [Amy Keller](#); [David Straite](#); [Ruby Ponce](#); [Alexander Sweatman](#); [Heaven Haile](#); [Llama BSF](#); [Josh Schiller](#); [David Boies](#); [Maxwell Pritt](#); [z/Meta-Kadrey](#)
Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines
Date: Friday, October 11, 2024 3:30:32 PM

Confirmed, thanks Liz. Will you prepare a stipulation? Someone else from Plaintiffs can review and provide final sign off since I'll be offline.

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Friday, October 11, 2024 6:27 PM

To: David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>
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Subject: RE: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

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Great – we have sign off on the below, which I believe reflects the parties' agreements over these emails but please confirm.

| Case Event | Compromise Proposal |
|--|--|
| Serve Additional Written Discovery Requests | October 18, 2024 |
| Meet/Confer re: Existing Written Discovery | Wednesday, October 16 (per the parties earlier agreement over email) |
| Exchange Supplemental Initial Disclosures | Monday, October 21 |
| Letter Briefs re: Existing Written Discovery | Wednesday, October 23 |
| Close of Fact Discovery | December 13, 2024 |
| Expert Reports | |
| Opening Expert Reports Due | January 10, 2025 |
| Rebuttal Expert Reports Due | Feb. 3, 2025 |
| Close of Expert Discovery | Feb. 26, 2025 |

| | |
|--|----------------|
| Summary Judgment and Daubert Motions | |
| Opening MSJ/ <i>Daubert</i> Briefs Due | March 7, 2025 |
| Opposition to MSJ/ <i>Daubert</i> Briefs Due | April 3, 2025 |
| Reply MSJ/ <i>Daubert</i> Briefs Due | April 17, 2025 |
| Motion for Summary Judgment Hearing | May 1, 2025 |

From: David Simons <dsimons@BSFLLP.com>

Sent: Friday, October 11, 2024 3:16 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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[External]

Assuming we have agreement on everything else, that's OK. Thanks.

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Friday, October 11, 2024 6:14 PM

To: David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Hi David – we are very close – while we are getting final client sign off, would you be amenable to moving the date for initial disclosures to October 21?

From: David Simons <dsimons@BSFLLP.com>

Sent: Friday, October 11, 2024 3:11 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

[External]

Hi Liz, the Jewish holiday is starting imminently here on the East Coast. Any update on your end? Thanks.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Friday, October 11, 2024 5:13 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

Hi Liz,

Thanks for the prompt reply.

1. In the interest of reaching agreement, we can agree to dates of April 3 and April 17 for the last two deadlines.
2. Sure, we mean that both parties will go back over their FRCP 26 initial disclosures and update them based on information that has come to light during discovery or otherwise due to the passage of time. We understand that this is a continuing obligation for both parties, but believe it would be beneficial to have a date certain by which both parties commit to undertake this exercise in the first instance.

Best,
David

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Friday, October 11, 2024 5:00 PM

To: David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

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Hi David,

We are looking at the below but while we are discussing internally, we wanted to note a few things:

- We do not believe Judge Chhabria will want a schedule that doesn't provide him with 2 full weeks between filing of replies and the hearing.
- Could you explain what you mean by "Exchange Supplemental Initial Disclosures"?

Best,

Liz

From: David Simons <dsimons@BSFLLP.com>

Sent: Friday, October 11, 2024 1:52 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

[External]

Counsel,

Given the short time remaining before the Jewish holiday begins on the East Coast, Plaintiffs have quickly developed a compromise proposal that largely splits the difference on expert dates and summary judgment/Daubert, and also seeks agreement to codify a limited subset of additional deadlines that will facilitate discovery moving forward expeditiously. Please let us know whether this proposal is acceptable. Should Meta disagree, Plaintiffs reserve all rights to propose other discovery deadlines. Thanks.

Best,
David

| Case Event | Plaintiffs' Proposed Deadline | Defendant's Proposal | Compromise Proposal |
|--|-------------------------------|--|--|
| Serve Additional Written Discovery Requests | Fri Oct 11, 2024 | October 18, 2024 | October 18, 2024 |
| Identification of Add'l Document Custodians/Deponents | Fri Oct 11, 2024 | N/A | |
| Letter Briefs re: Add'l Custodians/Deponents | Fri Oct 11, 2024 | Letter Brief re: Add'l Deposition(s) – Fri Oct 11, 2024 Letter Brief re: Add'l Custodians – after meet and confer is complete, pursuant to ESI Order protocols. | N/A given that the briefing on depositions is going in today. |
| Meet/Confer re: Existing Written Discovery | Mon Oct 14, 2024 | N/A | Wednesday, October 16 (per the parties earlier agreement over email) |
| Exchange updated Privilege Logs | Wed Oct. 16, 2024 | N/A | |
| Meet & Confer re: Updated Privilege Logs | Wed Oct. 23, 2024 | N/A | |
| Exchange Supplemental Initial Disclosures | Wed Oct 16, 2024 | N/A | Wednesday, October 16 |
| Motion for Leave to Amend Complaint | Fri Oct 18, 2024 | N/A | |
| Letter Briefs re: Existing Written Discovery | Fri Oct 18, 2024 | N/A | Wednesday, October 23 |
| Responses To Add'l Discovery (served by 10/11) | Mon Nov 4, 2024 | N/A (Federal Rules Apply) | |
| Documents/Priv. Logs for Add'l Discovery (served by 10/11) | Thu Nov 7, 2024 | N/A (Federal Rules Apply) | |

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|---|-------------------|-------------------------|-------------------|
| Meet/Confer re: Responses to Addt'l Discovery (served by 10/11) | Wed Nov 13, 2024 | N/A | |
| Letter Briefs re: Addt'l Discovery (served by 10/11) | Fri Nov 15, 2024 | N/A (Local Rules Apply) | |
| Close of Fact Discovery | December 13, 2024 | December 13, 2024 | December 13, 2024 |
| Expert Reports | | | |
| Opening Expert Reports Due | Fri Jan 10, 2025 | January 10, 2025 | Same |
| Rebuttal Expert Reports Due | Wed Feb 5, 2025 | January 31, 2025 | Feb. 3, 2025 |
| Close of Expert Discovery | Wed Feb 26, 2025 | February 21, 2025 | Feb. 26, 2025 |
| Summary Judgment and Daubert Motions | | | |
| Opening MSJ/Daubert Briefs Due | Wed Mar 12, 2025 | February 28, 2025 | March 7, 2025 |
| Opposition to MSJ/Daubert Briefs Due | Wed Apr 9, 2025 | March 28, 2025 | April 4, 2025 |
| Reply MSJ/Daubert Briefs Due | Wed Apr 23, 2025 | April 17, 2025 | April 18, 2025 |
| Motion for Summary Judgment Hearing | Thu May 1, 2025 | May 1, 2025 | Same |

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Friday, October 11, 2024 2:59 PM

To: David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L.

<adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Subject: RE: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

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Counsel,

Below are our proposed dates. If you are agreeable to our proposal (which includes removing the dates that we do not think are necessary for this schedule), we can get this on file. If we have disputes, we would suggest both sides have a short (half page) position statement as to our proposed schedule.

| | | |
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| | | |
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| Case Event | Plaintiffs' Proposed Deadline | Defendant's Proposal |
|---|-------------------------------|--|
| Serve Additional Written Discovery Requests | Fri Oct 11, 2024 | October 18, 2024 |
| Identification of Addt'l Document Custodians/Deponents | Fri Oct 11, 2024 | N/A |
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| Opening Expert Reports Due | Fri Jan 10, 2025 | January 10, 2025 |
| Rebuttal Expert Reports Due | Wed Feb 5, 2025 | January 31, 2025 |
| Close of Expert Discovery | Wed Feb 26, 2025 | February 21, 2025 |
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| Opposition to MSJ/Daubert Briefs Due | Wed Apr 9, 2025 | March 28, 2025 |
| Reply MSJ/Daubert Briefs Due | Wed Apr 23, 2025 | April 17, 2025 |
| Motion for Summary Judgment Hearing | Thu May 1, 2025 | May 1, 2025 |

From: David Simons <dsimons@BSFLLP.com>

Sent: Friday, October 11, 2024 8:29 AM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

[External]

Counsel, following up on the below from yesterday. I do not believe we have received a response. Please let us know if we can stipulate to these deadlines. FYI, certain members of our team (including me) will be observing the Jewish holiday starting in a few hours on the East Coast so we would appreciate reaching resolution promptly. Thanks.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Thursday, October 10, 2024 2:57 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Proposed Adjusted Discovery Deadlines

Counsel,

Per the Court's Order, below are Plaintiffs' proposed deadlines for the remainder of discovery. Please advise if Defendant is willing to stipulate to these deadlines or otherwise let us know Defendant's position so we can meet and confer as necessary. Thanks.

| Case Event | Proposed Deadline |
|--|-------------------|
| Additional Written Discovery Requests | Fri Oct 11, 2024 |
| Identification of Addt'l Document Custodians/Deponents | Fri Oct 11, 2024 |

| | |
|---|-------------------|
| Letter Briefs re: Addt'l Custodians/Deponents | Fri Oct 11, 2024 |
| Meet/Confer re: Existing Written Discovery | Mon Oct 14, 2024 |
| Exchange updated Privilege Logs | Wed Oct. 16, 2024 |
| Meet & Confer re: Updated Privilege Logs | Wed Oct. 23, 2024 |
| Exchange Supplemental Initial Disclosures | Wed Oct 16, 2024 |
| Motion for Leave to Amend Complaint | Fri Oct 18, 2024 |
| Letter Briefs re: Existing Written Discovery/Priv. Logs | Fri Oct 18, 2024 |
| Responses To Addt'l Discovery (served by 10/11) | Mon Nov 4, 2024 |
| Documents/Priv. Logs for Addt'l Discovery (served by 10/11) | Thu Nov 7, 2024 |
| Meet/Confer re: Responses to Addt'l Discovery (served by 10/11) | Wed Nov 13, 2024 |
| Letter Briefs re: Addt'l Discovery (served by 10/11) | Fri Nov 15, 2024 |
| Close of Fact Discovery | December 13, 2024 |
| Expert Reports | |
| Opening Expert Reports Due | Fri Jan 10, 2025 |
| Rebuttal Expert Reports Due | Wed Feb 5, 2025 |
| Close of Expert Discovery | Wed Feb 26, 2025 |
| Summary Judgment and Daubert Motions | |
| Opening MSJ/Daubert Briefs Due | Wed Mar 12, 2025 |
| Opposition to MSJ/Daubert Briefs Due | Wed Apr 9, 2025 |
| Reply MSJ/Daubert Briefs Due | Wed Apr 23, 2025 |
| Motion for Summary Judgment Hearing | Thu May 1, 2025 |

From: David Simons <dsimons@BSFLLP.com>

Sent: Thursday, October 10, 2024 2:16 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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<mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Kadrey v. Meta - Plaintiffs' Third Set of Interrogatories

Counsel,

Please see attached. As per the letter Plaintiffs sent on October 9, please advise us promptly if you will consent to an increase in the number of interrogatories, otherwise we will raise that issue with Judge Hixson. We are available to meet and confer at your earliest convenience.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Wednesday, October 9, 2024 6:46 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Plaintiffs' Fifth Set of RFPs

Counsel,

Please see attached. If you have any questions or objections, please let us know promptly so we can meet and confer at your earliest convenience.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Wednesday, October 9, 2024 6:34 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen

<ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Plaintiffs' First Set of RFAs

Counsel,

Please see attached. If you have any questions or objections, please let us know promptly so we can meet and confer at your earliest convenience.

Best,
David

From: David Simons <dsimons@BSFLLP.com>

Sent: Tuesday, October 8, 2024 8:14 PM

To: Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Kadrey v. Meta - Amended Notice of 30(b)(6) Deposition:

Counsel,

Please find attached an amended notice of a 30(b)(6) deposition for Meta Platforms, Inc. We are happy to discuss scheduling at your earliest convenience given Judge Hixson's order regarding the amount of time Plaintiffs will have, which will necessitate multiple deposition days. If you anticipate lodging any objections to the amended notice, please let us know promptly so we can begin the meet and confer process. Thanks.

Best,
David

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